

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

Paul G. Saris

10/25/05 delivered

UNITED STATES OF AMERICA)	CRIMINAL ACTION No. 04-10299-PBS
v.)	
LUZ LUCIANO, ET. AL.)	

MOTION FOR WAIVER OF ELECTRONIC FILING

NOW comes counsel for the defendant and moves this Honorable Court grant a waiver of electronic filing as to the Defendants' Grullon and Martinez Joint Motion to Dismiss for Violation of Right to Speedy Trial for the following reasons:

1. Counsel is aware of Judge Saris's standing order requiring electronic filing at this date, however, this counsel does not have the ability to comply with ECF at this time.
2. At this time, counsel is making great efforts to update his office computer system and staff to comply with the noticed November 1, 2005 date for mandatory ECF filing in the Massachusetts Federal Courts and expects that as of that date to be compliant with the ECF requirement.

WHEREFORE, counsel pray this Honorable Court grant this Motion for Waiver and further allow paper filing of the Defendant's Joint Motion

RESPECTFULLY SUBMITTED,
On behalf of defendants Grullon and
Martinez,


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